



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

OCT 30 2017

Mr. Bill Brick
Chief, Monitoring and Technical Services
San Diego Air Pollution Control District
10124 Old Grove Road
San Diego, California 92131-1640

Dear Dr. Brick:

Thank you for your submission of the San Diego Air Pollution Control District (SDAPCD) *2016 Annual Air Quality Monitoring Network Plan* in July 30, 2016. We have reviewed the submitted document based on the requirements set forth under 40 CFR 58. Based on the information provided in the plan, the U.S. Environmental Protection Agency (EPA) approves all portions of the network plan except those specifically identified below. With this plan approval, we also formally approve the following system modifications: discontinuation of the Del Mar monitoring site (AQS ID: 06-073-1001), discontinuation of CO monitoring at San Diego-Beardsley St./Perkins Elementary (AQS ID: 06-073-1010) and Escondido (AQS ID: 06-073-1002) monitoring sites, relocation San Diego Overland (AQS ID: 06-073-0006) to Kearny Villa Road (AQS ID: 06-073-1016), and the relocation of Perkins Elementary (AQS ID: 06-073-1010) to Sherman Elementary School (AQS ID: 06-073-1026). More information about these approvals are in enclosures C, D, E, and F.

Please note that we cannot approve portions of the annual network plan for which the information in the plan is insufficient to judge whether the requirement has been met, or for which the information, as described, does not meet the requirements as specified in 40 CFR 58.10 and the associated appendices. EPA Region 9 also cannot approve portions of the plan for which the EPA Administrator has not delegated approval authority to the regional offices. Accordingly, the first enclosure (*A. Annual Monitoring Network Plan Items where EPA is Not Taking Action*) provides a listing of specific items of your agency's annual monitoring network plan where EPA is not taking action. The second enclosure (*B. Additional Items Requiring Attention*) is a listing of additional items in the plan that EPA wishes to bring to your agency's attention.

The seventh enclosure (*G. Annual Monitoring Network Plan Checklist*) is the checklist EPA used to review your plan for overall items that are required to be included in the annual network plan along with our assessment of whether the plan submitted by your agency addresses those requirements.

The first two enclosures highlight a subset of the more extensive list of items reviewed in the seventh. All comments conveyed via this letter (and enclosures) should be addressed (through

corrections within the plan, additional information being included, or discussion) in next year's annual monitoring network plan.

If you have any questions regarding this letter or the enclosed comments, please feel free to contact me at (415) 947-4134 or Michael Flagg at (415) 972-3372.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Gwen Yoshimura', with a long horizontal flourish extending to the right.

Gwen Yoshimura, Manager
Air Quality Analysis Office

Enclosures:

- A. Annual Monitoring Network Plan Items where EPA is Not Taking Action
- B. Additional Items Requiring Attention
- C. Approval of Discontinuation of O₃ monitoring at Del Mar
- D. Approval of Discontinuation of CO monitoring at Perkins Elementary and Escondido
- E. Approval of Relocation of San Diego Overland to Kearny Villa Road
- F. Approval of Relocation of Perkins Elementary to Sherman Elementary School
- G. Annual Monitoring Network Plan Checklist

cc (via email): David Shina, SDAPCD
David Craig, SDAPCD
Gayle Sweigert, CARB
Sunghoon Yoon, CARB
Ranjit Bhullar, CARB

A. Annual Monitoring Network Plan Items where EPA is Not Taking Action

We are not acting on the portions of annual network plans where either EPA Region 9 lacks the authority to approve specific items of the plan, or EPA has determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met.

- Per 40 CFR 58.11(c), NCore, PAMS, and STN network design and changes are subject to approval of the EPA Administrator. Therefore, we are not acting on these items:
 - Relocation of El Cajon – Floyd Smith Drive to Lexington Elementary School
- EPA identified items in your agency's annual monitoring network plan where a requirement was not being met or information in the plan was insufficient to judge whether the requirement was being met based on 40 CFR 58.10 and the associated appendices. Therefore, we are not acting on the following items:

Item	Checklist Row	Issue
Near-road NO ₂ monitor	50	Not meeting requirement
Near-road PM _{2.5} monitor	52	Not meeting requirement

Additional information for each of these items may be found for the row listed in column 2, in the seventh enclosure (*G. Annual Monitoring Network Plan Checklist*).

B. Additional Items Requiring Attention

- [Item 33] Flow audits at Donovan and Kearny Villa Road were conducted on 9/16/2016 and 12/18/2016, and 2/23/2016 and 10/14/2016, respectively. EPA recommends these be conducted within a 5-7 month interval.
- [Item 77] EPA recommends PM₁₀ monitors also have distances to supporting structures >1.8 m and notes the following: PM₁₀ FRMs at Donovan, Kearny Villa Road, and Chula Vista are 1.6 m from the supporting structure.

C. Approval of Discontinuation of O₃ Monitoring at Del Mar

Per 40 CFR 58.14, monitoring agencies are required to obtain EPA approval for the discontinuation of SLAMS monitors. Discontinuation of the O₃ SLAMS monitor at the Del Mar monitoring site (AQS ID: 06-073-1001) was specifically reviewed by EPA against criteria contained in 40 CFR 58.14(c) which states that “discontinuation may also be approved on a case-by-case basis if discontinuation does not compromise data collection needed for the implementation of the NAAQS [National Ambient Air Quality Standards] and if the requirements of appendix D to this part, if any, continue to be met.”

According to Table C4 in Chapter 2 of SDAPCD’s *2016 Annual Air Quality Monitoring Network Plan* (2017 ANP), Del Mar has shown attainment of the 2008 and 2015 O₃ NAAQS from 2012 through 2016, but has measured exceedances of the 2015 O₃ NAAQS during that period. Del Mar is located within the San Diego, CA 2008 O₃ Nonattainment area, which encompasses all of San Diego County. SDAPCD currently operates six additional O₃ monitors in the San Diego, CA 2008 O₃ Nonattainment area.

The Camp Pendleton O₃ monitor located 20 miles to the north measures similar concentrations to the Del Mar O₃ monitor. Neither site is designed as a maximum ozone concentration site; both sites were established on the coast, upwind of local sources, to primarily measure ozone transport from the South Coast Air Basin. The maximum ozone concentration and design value site for the area, the Alpine monitoring site, is located at approximately 2000 ft. elevation, 30 miles from the coast, and downwind from the major population centers of San Diego County. SDAPCD’s 2015 Network Assessment also showed a high Pearson Correlation ($r > 0.8$) and low relative differences (0.3) between Del Mar and Camp Pendleton O₃ monitors. Most recently, data presented in SDAPCD’s 2017 ANP show that the 2014-2016 design values for Camp Pendleton and Del Mar were 0.070 ppm and 0.067 ppm, respectively.

Based on these analyses, the discontinuance of the Del Mar O₃ monitor does not compromise data collection needed for the implementation of the NAAQS and will not prevent SDAPCD from meeting the 40 CFR 58, Appendix D requirements. Therefore, EPA approves SDAPCD’s request for discontinuation of the Del Mar O₃ SLAMS monitor.

D. Approval of Discontinuation of CO monitoring at Perkins Elementary and Escondido

Per 40 CFR 58.14, monitoring agencies are required to obtain EPA approval for the discontinuation of SLAMS monitors. Discontinuation of the CO SLAMS monitors at the San Diego-Beardsley St./Perkins Elementary (AQS ID: 06-073-1010) and Escondido (AQS ID: 06-073-1002) monitoring sites were specifically reviewed by EPA against criteria contained in 40 CFR 58.14(c)(1).

According to Tables D1a, D1b, D2a, and D2b in Chapter 2 of SDAPCD's *2016 Annual Air Quality Monitoring Network Plan*, both CO monitors at Perkins Elementary and Escondido were in attainment of the CO NAAQS from 2011-2015 and 2010-2014, respectively. The Perkins Elementary site was not operational for a full year in 2016, therefore the last full year of record is 2015. Similarly, the Escondido site was not operational for a full year in 2015 or 2016, therefore the last full year of record is 2014. Based on latest five design values for each monitor, there is a less than 10 percent probability of exceeding 80 percent of the CO 1-hour and 8-hour NAAQS during the next three years. These monitors are not specifically required by an attainment or maintenance plan, and are not the last CO monitors in a nonattainment or maintenance area. Furthermore, discontinuance of these monitors will not prevent SDAPCD from meeting 40 CFR 58 Appendix D requirements.

Based on these analyses, EPA approves discontinuation of the CO SLAMS monitors at the Perkins Elementary and Escondido monitoring sites.

E. Approval of Relocation of San Diego Overland to Kearny Villa Road

Per 40 CFR 58.14, monitoring agencies are required to obtain EPA approval for the relocation of SLAMS monitors. The O₃, PM_{2.5}, PM₁₀ and NO₂ SLAMS monitor relocations from San Diego Overland (AQS ID: 06-073-0006) to Kearny Villa Road (AQS ID: 06-073-1016) were specifically reviewed by EPA against criteria contained in 40 CFR 58.14(c)(6).

40 CFR 58.14(c)(6) describes the relocation requirements if a SLAMS monitor is not eligible for removal under the criteria in 40 CFR 58.14(c)(1) through (c)(5) and states that, “[a] SLAMS monitor...may be moved to a nearby location with the same scale of representation if logistical problems beyond the State’s control make it impossible to continue operation at its current site.”

SDAPCD noted in the *2010 Ambient Air Quality Network Plan* and subsequent annual network plans that demolition and construction was planned for the San Diego Overland property. The site was subsequently decommissioned on February 18, 2012. The replacement site, Kearny Villa Road, is located 1.1 km away from the existing location and was expected to measure similar O₃, PM_{2.5}, PM₁₀, and NO₂ concentrations from similar sources due to the consistency in land uses and proximity to sources. Operation of O₃, PM_{2.5}, PM₁₀, and NO₂ monitors at Kearny Villa Road started on November 11, 2010, February 1, 2012, February 1, 2012, and January 1, 2012, respectively.

EPA reviewed current design values for O₃, PM_{2.5}, and NO₂ monitors and maximum concentrations for PM₁₀ at Kearny Villa Road compared to historical values at San Diego Overland and found that concentrations are similar and consistent with expected trends. EPA also notes that Kearny Villa Road currently meets all 40 CFR 58 requirements, including the siting requirements specified in Appendix E.

Based on the assessment of proximity, land use, nearby sources, anticipated concentrations at the time of the relocation, and current measured concentrations, EPA has determined SDAPCD’s request meets the requirement that the replacement site is at a nearby location with the same scale of representation and approves SDAPCD’s relocation of the San Diego Overland O₃, PM_{2.5}, PM₁₀, and NO₂ SLAMS monitors to the Kearny Villa Road location approximately 1.1 km north-northeast of the San Diego Overland location. As this is a relocation, the data from the old and new sites will be combined to form one continuous data record for design value calculations. Please note this in the AQS comment field for both the old and the new AQS site.

F. Approval of Relocation of Perkins Elementary to Sherman Elementary

Per 40 CFR 58.14, monitoring agencies are required to obtain EPA approval for the relocation of SLAMS monitors. The O₃, NO₂, PM_{2.5}, and PM₁₀ SLAMS monitor relocations from San Diego-Beardsley St./Perkins Elementary (AQS ID: 06-073-1010) to Sherman Elementary (AQS ID: 06-073-1026) were specifically reviewed by EPA against criteria contained in 40 CFR 58.14(c)(6).

40 CFR 58.14(c)(6) describes the relocation requirements if a SLAMS monitor is not eligible for removal under the criteria in 40 CFR 58.14(c)(1) through (c)(5) and states that, “[a] SLAMS monitor...may be moved to a nearby location with the same scale of representation if logistical problems beyond the State’s control make it impossible to continue operation at its current site.”

SDAPCD noted in the *2016 Ambient Air Quality Network Plan* (2017 ANP) that the school authorities at Perkins Elementary enacted the eviction clause in the established Memorandum of Understanding (MOU) and requested that the monitoring site be moved by July 31, 2016. The PM_{2.5} and PM₁₀ monitoring was subsequently decommissioned on September 30, 2016 and September 27, 2016, respectively. The O₃ and CO monitoring was decommissioned on October 24, 2016.

The replacement site, Sherman Elementary, is located approximately 1.1 km away from the existing location and expected to measure similar O₃, NO₂, PM_{2.5}, and PM₁₀ concentrations from similar sources due to the consistency in land uses and proximity to sources. SDAPCD further notes that the new location has the potential to measure higher concentration of O₃ and particulate matter because it is downwind of Interstate-5 and State Route 94. The Sherman Elementary location is also located downwind from the existing location and, therefore, will capture the same emissions from sources upwind of the area.

Based on the assessment of proximity, land use, nearby sources, and anticipated concentrations above, EPA has determined SDAPCD’s request meets the requirement that the replacement site is at a nearby location with the same scale of representation and approves SDAPCD’s relocation of the Perkins Elementary O₃, NO₂, PM_{2.5}, and PM₁₀ SLAMS monitors to the proposed site at Sherman Elementary approximately 1.1 km northeast of the current site location. As described in line 48 of Enclosure G, Perkins Elementary was designated as an RA 40 site for NO₂. This designation also applies to the Sherman Elementary NO₂ monitoring.

This approval assumes that the new site will meet all 40 CFR 58 requirements, including the siting requirements specified in Appendix E, as described in the site table for the proposed site in SDAPCD’s 2017 ANP. Please work with EPA to ensure that the new site meets all relevant requirements. As this is a relocation, the data from the old and new sites will be combined to form one continuous data record for design value calculations. Please note this in the AQS comment field for both the old and the new AQS site.

G. ANNUAL MONITORING NETWORK PLAN CHECKLIST

(Updated February 9, 2017)

Year: 2017

Agency: San Diego Air Pollution Control District (SDAPCD)

40 CFR 58.10(a)(1) requires that each Annual Network Plan (ANP) shall provide for the documentation of the establishment and maintenance of an air quality surveillance system that consists of a network of SLAMS monitoring stations that can include FRM, FEM, and ARM monitors that are part of SLAMS, NCore, CSN, PAMS, and SPM stations.

40 CFR 58.10(a)(1) further directs that, "The plan shall include a statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E of this part, where applicable. The Regional Administrator may require additional information in support of this statement." On this basis, review of the ANPs is based on the requirements listed in 58.10 along with those in Appendices A, C, D, and E.

EPA Region 9 will not take action to approve or disapprove any item for which Part 58 grants approval authority to the Administrator rather than the Regional Administrators, but we will do a check to see if the required information is included and correct. The items requiring approval by the Administrator are: PAMS, NCore, and Speciation (STN/CSN).

Please note that this checklist summarizes many of the requirements of 40 CFR Part 58, but does not substitute for those requirements, nor do its contents provide a binding determination of compliance with those requirements. The checklist is subject to revision in the future and we welcome comments on its contents and structure.

Key:

White	meets the requirement
Yellow	requirement is not met, or information is insufficient to make a determination. Action requested in next year's plan or outside the ANP process (items listed in Enclosure A).
Green	item requires attention in order to improve next year's plan (items listed in Enclosure B).

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s.	Does the information provided ³ meet the requirement? ⁴	Notes
GENERAL PLAN REQUIREMENTS					
1.	Submit plan by July 1 st	58.10 (a)(1)	Y	Y	
2.	30-day public comment / inspection period	58.10 (a)(1); 58.10 (c)	Y, Chapter 1 p. 2	Y	
3.	Statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E, where applicable	58.10 (a)(1)	Y, Chapter 2 p.15; Chapter 3 - 9	Y	
4.	Modifications to SLAMS network – case when we are not approving system modifications	58.10 (a)(2); 58.10 (b)(5); 58.10 (e); 58.14	Y, Chapter 2 p. 16 – 40	Y	System modifications to the NCORE network must be approved by the Administrator, therefore, EPA Region 9 does not have the authority to approve relocation of NCORE monitoring from El Cajon Floyd Smith Dr. to Lexington Elementary, but will continue to work with OAQPS to obtain formal approval.
5.	Modifications to SLAMS network – case when we are approving system modifications per 58.14	58.10 (a)(2); 58.10 (b)(5); 58.10 (e); 58.14	Y, Chapter 2 p. 16 – 40	Y	See Enclosures C, D, E, and F
6.	Does plan include documentation (e.g., attached approval letter) for system modifications that have been approved since last ANP approval?		Y, Chapter 2 p. 16 – 40	Y	
7.	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)	Y, Chapter 2 p. 16 – 40	Y	
8.	Precision/Accuracy reports submitted to AQS	58.16 (a)	Y, Chapter 2 p. 15	Y	
9.	Annual data certification submitted	58.15	Y, Chapter 2 p. 15	Y	

¹ Unless otherwise noted.

² Response options: NA (Not Applicable), Yes, No, or Incomplete.

³ Assuming the information is correct.

⁴ Response options: NA (Not Applicable) – [reason], Yes, No, Insufficient to Judge, or Incorrect

	ANP requirement	Citation within 40 CFR 58¹	Was the information submitted?² If yes, page #s.	Does the information provided³ meet the requirement?⁴	Notes
10.	Statement that SPMs operating an FRM/FEM/ARM that meet Appendix E also meet either Appendix A or an approved alternative. Documentation for any Appendix A approved alternative should be included. ⁵	58.11 (a)(2)	N/A	N/A	
11.	SPMs operating FRM/FEM/ARM monitors for over 24 months are listed as comparable to the NAAQS or the agency provided documentation that requirements from Appendices A, C, or E were not met. ⁶	58.20 (c)	N/A	N/A	
12.	For agencies that share monitoring responsibilities in an MSA/CSA: this agency meets full monitoring requirements or an agreement between the affected agencies and the EPA Regional Administrator is in place	App D 2(e)	N/A	N/A	
GENERAL PARTICULATE MONITORING REQUIREMENTS (PM₁₀, PM_{2.5}, Pb-TSP, Pb-PM₁₀)					
13.	Designation of a primary monitor if there is more than one monitor for a pollutant at a site.	App. A 3.2.3	Y, Chapter 2	Y	
14.	Distance between QA collocated monitors. For low volume PM instruments (flow rate < 200 liters/minute) > 1 m. For high volume PM instruments (flow rate > 200 liters/minute) > 2m. [Note: waiver request or the date of previous waiver approval must be included if the distance deviates from requirement.]	App. A 3.2.3.4 (c) and 3.3.4.2 (c)	Y, Appendix 1-12	Y	
PM_{2.5} –SPECIFIC MONITORING REQUIREMENTS					
15.	Document how states and local agencies provide for the review of changes to a PM _{2.5} monitoring network that impact the location of a violating PM _{2.5} monitor.	58.10 (c)	Y, Chapter 8 p. 6	Y	

⁵ Alternatives to the requirements of appendix A may be approved for an SPM site as part of the approval of the annual monitoring plan, or separately.

⁶ This requirement only applies to monitors that are eligible for comparison to the NAAQS per 40 CFR §§58.11(e) and 58.30.

	ANP requirement	Citation within 40 CFR 58¹	Was the information submitted?² If yes, page #s.	Does the information provided³ meet the requirement?⁴	Notes
16.	Identification of any PM _{2.5} FEMs and/or ARMs not eligible to be compared to the NAAQS due to poor comparability to FRM(s) [Note 1: must include required data assessment.] [Note 2: Required SLAMS must monitor PM _{2.5} with <u>NAAQS-comparable</u> monitor at the required sample frequency.]	58.10 (b)(13) 58.11 (e)	N/A	N/A	
17.	Minimum # of monitoring sites for PM _{2.5} [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App. D 4.7.1(a) and Table D-5	Y, Chapter 8 p. 4-5	Y	
18.	Requirements for continuous PM _{2.5} monitoring (number of monitors and collocation)	App. D 4.7.2	Y, Chapter 8 p. 9	Y	
19.	FRM/FEM/ARM PM _{2.5} QA collocation	App. A 3.2.3	Y, Chapter 8 p.6	Y	
20.	PM _{2.5} Chemical Speciation requirements for official STN sites	App. D 4.7.4	Y, Chapter 2	Y	
21.	Identification of sites suitable and sites not suitable for comparison to the annual PM _{2.5} NAAQS as described in Part 58.30	58.10 (b)(7)	Y, Chapter 8 p. 12; Appendix 1-12	Y	
22.	Required PM _{2.5} sites represent area-wide air quality	App. D 4.7.1(b)	Y, Chapter 2 p. 9; Appendix 1-12	Y	
23.	For PM _{2.5} , within each MSA, at least one site at neighborhood or larger scale in an area of expected maximum concentration	App. D 4.7.1(b)(1)	Y, Chapter 2 p. 9; Chapter 8 p.6; Appendix 1-12	Y	
24.	If additional SLAMS PM _{2.5} is required, there is a site in an area of poor air quality	App. D 4.7.1(b)(3)	Y, Chapter 8 p. 7	Y	
25.	States must have at least one PM _{2.5} regional background and one PM _{2.5} regional transport site.	App. D 4.7.3	N/A	N/A	

	ANP requirement	Citation within 40 CFR 58¹	Was the information submitted?² If yes, page #s.	Does the information provided³ meet the requirement?⁴	Notes
26.	Sampling schedule for PM _{2.5} - applies to year-round and seasonal sampling schedules (note: date of waiver approval must be included if the sampling season deviates from requirement)	58.10 (b)(4); 58.12(d); App. D 4.7	Y, Chapter 2 p. 4; Chapter 8 p. 13-14	Y	
27.	Frequency of flow rate verification for automated and manual PM _{2.5} monitors	App. A 3.2.1	Y, Appendix 1-12	Y	
28.	Dates of two semi-annual flow rate audits conducted in CY2016 for PM _{2.5} monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App. A 3.2.2	Y, Appendix 1-12	Y	

PM₁₀ –SPECIFIC MONITORING REQUIREMENTS

29.	Minimum # of monitoring sites for PM ₁₀ [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App. D, 4.6 (a) and Table D-4	Y, Chapter 9 p. 2	Y	
30.	Manual PM ₁₀ method collocation (note: continuous PM ₁₀ does not have this requirement)	App. A 3.3.4	Y, Chapter 9 p. 5	Y	
31.	Sampling schedule for PM ₁₀	58.10 (b)(4); 58.12(e); App. D 4.6	Y, Chapter 9 p. 5	Y	
32.	Frequency of flow rate verification for automated and manual PM ₁₀ monitors	App. A 3.3.1 and 3.3.2	Y, Appendix 1-12	Y	
33.	Dates of two semi-annual flow rate audits conducted in CY2016 for PM ₁₀ monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App. A 3.3.3	Y, Appendix 1-12	Y	Flow audits at Donovan and Kearny Villa Road were conducted on 9/16/2016 and 12/18/2016, and 2/23/2016 and 10/14/2016, respectively.

Pb –SPECIFIC MONITORING REQUIREMENTS

34.	Minimum # of monitors for non-NCore Pb [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.5	Y, Chapter 7 p. 3-4	Y	
35.	Pb collocation: for non-NCore sites	App A 3.4.4 and 3.4.5	Y, Chapter 7 p. 5	Y	

	ANP requirement	Citation within 40 CFR 58¹	Was the information submitted?² If yes, page #s.	Does the information provided³ meet the requirement?⁴	Notes
36.	Any source-oriented Pb site for which a waiver has been granted by EPA Regional Administrator	58.10 (b)(10)	N/A	N/A	
37.	Any Pb monitor for which a waiver has been requested or granted by EPA Regional Administrator for use of Pb-PM ₁₀ in lieu of Pb-TSP	58.10 (b)(11)	N/A	N/A	
38.	Designation of any Pb monitors as either source-oriented or non-source-oriented	58.10 (b)(9)	Y, Chapter 2 p. 8; Appendix 1-12	Y	
39.	Sampling schedule for Pb	58.10 (b)(4); 58.12(b); App A 3.4.4.2 (c) and 3.4.5.3 (c)	Y, Chapter 8 p. 6	Y	
40.	Frequency of flow rate verification for Pb monitors audit	App A 3.4.1 and 3.4.2	Y, Appendix 1-12	Y	
41.	Dates of two semi-annual flow rate audits conducted in CY2016 for Pb monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App A 3.4.3	Y, Appendix 1-12	Y	
GENERAL GASEOUS MONITORING REQUIREMENTS					
42.	Frequency of one-point QC check (gaseous)	App. A 3.1.1	Y, Appendix 1-12	Y	
43.	Date of Annual Performance Evaluation (gaseous) conducted in CY2016	App. A 3.1.2	Y, Appendix 1-12	Y	
O₃ -SPECIFIC MONITORING REQUIREMENTS					
44.	Minimum # of monitoring sites for O ₃ [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.] [Note 3: monitors that do not meet traffic count/distance requirements to be neighborhood or urban scale (40 CFR Appendix E, Table E-1) cannot be counted towards meeting minimum monitoring requirements]	App D 4.1(a) and Table D-2	Y, Chapter 3 p. 3	Y	

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s.	Does the information provided ³ meet the requirement? ⁴	Notes
45.	Identification of maximum concentration O ₃ site(s)	App D 4.1 (b)	Y, Chapter 3 p. 4; Appendix 1-12	Y	
46.	Sampling season for O ₃ (Note: Waivers must be renewed annually. EPA expects agencies to submit re-evaluations of the relevant data each year with the ANP. EPA will then respond as part of the ANP response.)	58.10 (b)(4); App D 4.1(i)	Y, Appendix 1-12	Y	

NO₂ –SPECIFIC MONITORING REQUIREMENTS

47.	Minimum monitoring requirements for area-wide NO ₂ monitor in location of expected highest NO ₂ concentrations representing neighborhood or larger scale (operation required by 1/1/13)	App D 4.3.3	Y, Chapter 4 p.9	Y	
48.	Minimum monitoring requirements for susceptible and vulnerable populations monitoring (aka RA40) NO ₂ (operation required by January 1, 2013)	App D 4.3.4	Y, Chapter 4 p.9	Y	The previously designated RA 40 site was located at Perkins Elementary, which was shut down due to loss of lease in 2016. Relocation of the site to Sherman Elementary was approved as part of this ANP review. See Enclosure F.
49.	Identification of required NO ₂ monitors as either near-road, area-wide, or vulnerable and susceptible population (aka RA40)	58.10 (b)(12)	Y, Chapter 4	Y	

NEAR ROADWAY – SPECIFIC MONITORING REQUIREMENTS

In CBSAs ≥ 2.5 million, the following near-roadway minimum monitoring requirements apply:

50.	Two NO ₂ monitors	App. D 4.3.2(a); 58.13(c)(3) and (4)	Y, Chapter 4 Appendix 12	N	Currently, the second near-road NO ₂ monitoring is not operational. EPA notes that San Diego continues to work toward establishing the 2 nd near-road location as soon as practicably possible and a suitable site has been found in San Ysidro.
51.	One CO monitor	App. D 4.2.1(a); 58.13(e)(2)	Y, Chapter 4 Appendix 12	Y	
52.	One PM _{2.5} monitor	App. D 4.7.1(b)(2); 58.13(f)(2)	Y, Chapter 4	N	See Item 50 for discussion on 2 nd near-road site.

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s.	Does the information provided ³ meet the requirement? ⁴	Notes
In CBSAs ≥ 1 million and AADT $\geq 250K$, the following near-roadway minimum monitoring requirements apply:					
53.	Two NO ₂ monitors	App. D 4.3.2(a); 58.13(c)(3) and (4)	N/A	N/A	
54.	One CO monitor (by 1/1/2017)	App. D 4.2.1(a); 58.13(e)(2)	N/A	N/A	
55.	One PM _{2.5} monitor (by 1/1/2017)	App. D 4.7.1(b)(2); 58.13(f)(2)	N/A	N/A	
In CBSAs ≥ 1 million and ≤ 2.5 million AND AADT $< 250K$, the following near-roadway minimum monitoring requirements apply:					
56.	One NO ₂ monitors	App. D 4.3.2(a); 58.13(c)(3)	N/A	N/A	
57.	One CO monitor (by 1/1/2017)	App. D 4.2.1(a); 58.13(e)(2)	N/A	N/A	
58.	One PM _{2.5} monitor (by 1/1/2017)	App. D 4.7.1(b)(2); 58.13(f)(2)	N/A	N/A	
SO₂ –SPECIFIC MONITORING REQUIREMENTS					
59.	Minimum monitoring requirements for SO ₂ based on PWEI and/or RA required monitors under Appendix D 4.4.3 [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.4	Y, Chapter 6 p. 3	Y	
60.	Monitors used to meet Data Requirements Rule (operational no later than January 1, 2017.)	51.1203(c)	N/A	N/A	

	ANP requirement	Citation within 40 CFR 58 ¹	Was the information submitted? ² If yes, page #s.	Does the information provided ³ meet the requirement? ⁴	Notes
NCORE –SPECIFIC MONITORING REQUIREMENTS					
61.	NCORE site and all required parameters operational: year-round O ₃ , SO ₂ , CO, NO _y , NO, PM _{2.5} mass, PM _{2.5} continuous, PM _{2.5} speciation, PM _{10-2.5} mass, resultant wind speed at 10m, resultant wind direction at 10m, ambient temperature, relative humidity. NO _y waiver, if applicable.	App. D 3(b)	Y, Chapter 10	Y	
SITE OR MONITOR - SPECIFIC REQUIREMENTS (OFTEN INCLUDED IN DETAILED SITE INFORMATION TABLES)					
62.	AQS site identification number for each site	58.10 (b)(1)	Y, Chapter 2 P.2	Y	
63.	Location of each site: street address and geographic coordinates	58.10 (b)(2)	Y, Chapter 2 P.2	Y	
64.	MSA, CBSA, CSA or other area represented by the monitor	58.10 (b)(8)	Y, Appendix 1-12	Y	
65.	Parameter occurrence code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, Appendix 1-12	Y	
66.	Basic monitoring objective for each monitor	App D 1.1; 58.10 (b)(6)	Y, Appendix 1-12	Y	
67.	Site type for each monitor	App D 1.1.1	Y, Chapter 2 Appendix 1-12	Y	
68.	Monitor type for each monitor, and Network Affiliation(s) as appropriate	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, Chapter 2 Appendix 1-12	Y	

	ANP requirement	Citation within 40 CFR 58¹	Was the information submitted?² If yes, page #s.	Does the information provided³ meet the requirement?⁴	Notes
69.	Scale of representativeness for each monitor as defined in Appendix D	58.10(b)(6); App D	Y, Appendix 1-12	Y	
70.	Parameter code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, Appendix 1-12	Y	
71.	Method code and description (e.g., manufacturer & model) for each monitor	58.10 (b)(3); App C 2.4.1.2	Y, Appendix 1-12	Y	
72.	Sampling start date for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met			
73.	Distance of monitor from nearest road	App E 6	Y, Appendix 1-12	Y	
74.	Traffic count of nearest road	App E	Y, Appendix 1-12	Y	
75.	Groundcover	App E 3(a)	Y, Appendix 1-12	Y	
76.	Probe height	App E 2	Y, Appendix 1-12	Y	
77.	Distance from supporting structure (vertical and horizontal, if applicable, should be provided)	App E 2	Y, Appendix 1-12	Y	EPA recommends PM ₁₀ monitors also have distances to supporting structures >1.8 m and notes the following: PM ₁₀ FRMs at Donovan, Kearny Villa Road, and Chula Vista are 1.6 m from the supporting structure.
78.	Distance from obstructions on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(b)	Y, Appendix 1-12	Y	
79.	Distance from obstructions not on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(a)	Y, Appendix 1-12	Y	
80.	Distance from the drip line of closest tree(s)	App E 5	Y, Appendix 1-12	Y	
81.	Distance to furnace or incinerator flue	App E 3(b)	Y, Appendix 1-12	Y	

	ANP requirement	Citation within 40 CFR 58¹	Was the information submitted?² If yes, page #s.	Does the information provided³ meet the requirement?⁴	Notes
82.	Unrestricted airflow (expressed as degrees around probe/inlet or percentage of monitoring path)	App E, 4(a) and 4(b)	Y, Appendix 1-12	Y	
83.	Probe material (NO/NO ₂ /NO _y , SO ₂ , O ₃ ; For PAMS: VOCs, Carbonyls)	App E 9	Y, Appendix 1-12	Y	
84.	Residence time (NO/NO ₂ /NO _y , SO ₂ , O ₃ ; For PAMS: VOCs, Carbonyls)	App E 9	Y, Appendix 1-12	Y	

Public Comments on Annual Network Plan

Were comments submitted to the S/L/T agency during the public comment period?	No
Were comments included in ANP submittal?	N/A
Were any of the comments substantive? If yes, which ones? If comments were not substantive provide rationale.	N/A
Were S/L/T responses to substantive comments included in ANP submittal?	N/A
Were the S/L/T responses to substantive comments adequate?	N/A
Do the substantive comments require separate EPA response (i.e., agency response wasn't adequate)?	N/A
Are the sections of the annual network plan that received substantive comments approvable after consideration of comments? If yes, provide rationale	N/A

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